

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION

BRIAN BONNER,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	CASE NO. 3:06-cv-00715-MHT
	)	
INTERSTATE ARMS CORP., et al.,	)	
	)	
Defendants.	)	

**UNOPPOSED MOTION FOR EXTENSION OF TIME FOR DISCOVERY**

COMES NOW the plaintiff, BRIAN BONNER, and moves this Honorable Court to permit an extension of time in this case for additional discovery set out in this Court's Uniform Scheduling Order filed on July 12, 2007 as specified below and based upon the grounds stated:

1. The undersigned is filing this Motion with the agreement of and the concurrence of attorneys for the defendants, Qiqihar Hawk Industries Co., Ltd. and China North Industries Corporation ("Norinco").
2. Though the parties acknowledge and recognize the due diligence of each in meeting the discovery goals and deadlines of the Uniform Scheduling Order entered on July 12, 2007, they also acknowledge that the case demands additional discovery efforts which cannot be completed prior to May 26, 2008, the deadline stated in the Uniform Scheduling Order entered July 12, 2007. The parties have

been cooperating with each other and believe that an additional sixty (60) days is necessary to complete discovery.

3. The parties respectfully request this Honorable Court to permit an extension of time to these dates for said resolutions. The movant's attorney has been authorized by all parties to prepare and file this Motion.

WHEREFORE, PREMISES CONSIDERED, plaintiff prays that this Court will enter an Order extending the discovery deadline in the July 12, 2007 Uniform Scheduling Order for sixty (60) days.

**/s/ David J. Hodge**  
DAVID J. HODGE  
Of Counsel for Plaintiff

**OF COUNSEL:**

PITTMAN, DUTTON, KIRBY & HELLUMS, P.C.  
2001 Park Place North  
1100 Park Place Tower  
Birmingham, Alabama 35203  
(205) 322-8880  
(205) 328-2711 facsimile

Nick Wooten, Esq.  
WOOTEN & CARLTON, P.C.  
P.O. Drawer 290  
Lafayette, Alabama 36862

**CERTIFICATE OF SERVICE**

I hereby certify that on **20<sup>th</sup>** day of **May**, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Todd M. Higey, Esq.  
RICHARDSON CLEMENT, P.C.  
200 Cahaba Park Circle, Suite 125  
Birmingham, AL 35242  
*Attorney for Interstate Arms and Qiqihar Hawk*

James C. Barton, Jr., Esq.  
Alan D. Mathis, Esq.  
JOHNSTON, BARTON, PROCTOR & POWELL, LLP  
2900 Regions/Harbert Plaza  
1901 6th Avenue North  
Birmingham, AL 35203  
*Attorney for Norinco*

**/s/David J. Hodge**  
Of Counsel for Plaintiff